



iowa department of environmental quality

reply to: Barbara Cook - Main Office
phone: 515/281-8921

*EPA
D.A. Degner
File*

December 3, 1982

Mr. Lyndell Harrington
Chief, Permits Section, Waste Mgmt. Branch
Air & Waste Management Division
U.S. EPA, Region VII
324 East 11th St.
Kansas City, MO 64106

RE: Norplex Division, VOP, Inc. - Postville
EPA ID No. IAD073489288

Dear Lyn:

In response to your October 27, 1982, letter regarding the closure plan of Norplex Division, the Department has reviewed the plan and requested two certification statements by Norplex. These statements were received by this Department November 29, 1982.

Based on these certification statements and past site inspections by our regional office, this Department is satisfied that Norplex can ship their hazardous waste off-site in 90 days or less and that the facility is clean of any spill residues. Mr. Gene Evans of my staff is processing the changes to Norplex notification form.

This Department recommends that EPA rescind their March 4, 1982, Part B call and that Norplex's interim status be terminated. If you disagree with our recommendation please contact me as soon as possible.

Sincerely,

AIR AND LAND QUALITY DIVISION

Bruce E. Henning
Rod Vlieger, P.E.
Chief, Land Operations

RV:BC:nsv



R00330142
RCRA RECORDS CENTER

*EPA-ARHM/HAZM
DEC 06 1982
Region VII K.C., MO*

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

Regional Office #1
209 N. Franklin St.
Manchester 52057

Regional Office #2
509 S. President
P.O. Box 1443
Mason City 50401

Regional Office #3
401 Grand Ave.
P.O. Box 270
Spencer 51301

Regional Office #4
316 Walnut
Atlantic 50022

Regional Office #5
Henry A. Wallace
Building
Des Moines 50319

Regional Office #6
117 N. 2nd Ave.
P.O. Box 27
Washington 52353

Norplex Division
1300 Norplex Drive • P.O. Box 1448
La Crosse, Wisconsin 54601
Telephone 608-784-6070 • Telex 29-3422
FAX 608-784-7753

U.S. Operations: La Crosse, Wisconsin - Headquarters
Black River Falls, WI; Chandler, AZ; Franklin, IN; Postville, IA
European Operation: Wipperfurth, West Germany
Pacific Headquarters: Kowloon, Hong Kong

November 22, 1982

Nov 28 1982

Ms. Barbara Cook
Iowa Department of Environmental Quality
Main Office
Henry A. Wallace Building
Des Moines, Iowa 50319

Dear Ms. Cook:

Thank you for your letter of November 8, 1982.

With respect to the two questions that you asked, Norplex Division/Postville, Iowa certifies the following:

- (1) That the last shipment of hazardous waste was shipped on October 14, 1982 and that we will be prepared to ship on a ninety day basis upon notification by the D.E.Q. or the E.P.A. as to our change in status.
- (2) There have been no spills or residue from our operations.

Should you have any further questions, please feel free to contact George J. Stunyo at (608) 784-6070, Ext. 309.

Sincerely,

NORPLEX DIVISION
UOP Inc.



Allen K. Sparks
Vice President and General Manager

P.S. Please find enclosed an amended notice of Hazardous Waste Activity form.

cc: Chuck Englebert
Dennis Degner, E.P.A.

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., & day)

AMENDED NOV. 22, 1982

I. NAME OF INSTALLATION

NORPLEX DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 PO BOX 445

CITY OR TOWN

ST.

ZIP CODE

4 POSTVILLE

IA 52162

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 NE COUNTY RD

CITY OR TOWN

ST.

ZIP CODE

6 POSTVILLE

IA 52162

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 ENGLEBERT KILYCK PLANT MGR

319-864-7321

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 UOP INC

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☒ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION

☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IA D073489255

IX. DESCRIPTION OF HAZARDOUS WASTE

Please go to the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY									
5									
W									

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F003 23 - 26	2 F005 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 4002 23 - 26	32 4031 23 - 26	33 4069 23 - 26	34 4154 23 - 26	35 4159 23 - 26	36 4220 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

Deleted Nov 22, 1982

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

George J. Stunyo

NAME & OFFICIAL TITLE (Type or print)

GEORGE J. STUNYO
IND. REL. MANAGER

DATE SIGNED

Sept. 10, 1982

George J. Stunyo

Nov. 22, 1982

DATE 11/22/82

FILE NO. _____

TIME 3:00

DEPARTMENT OF ENVIRONMENTAL QUALITY

RECORD OF TELEPHONE CONVERSATION

PERSON CONTACTED George Stonyo

ADDRESS _____

FIRM NORPLEX Div.

PHONE NO. 608 784 - 6070

PERSON WHO MADE CALL: DEPARTMENT EMPLOYEE _____ OTHER PARTY X

SUBJECT NORPLEX HW STORAGE - POSTVILLE

CONVERSATION

DEPARTMENT EMPLOYEE

Date when no longer I.S. facility and
you would be shipping waste off-site
in 90 days or less

that's true

you seem to have covered all
the aspects I'll be waiting
for your letter

OTHER PARTY

Calling in response to DEQ 11/9/82 letter

what is meant by the date of last shipment

legally that would be the day when I.S.
is terminated. Norplex has a transporter
contract requiring shipment over 60 days

Also we would transport waste up to our
La Crosse Plt if the 90 days was approaching

clean-up, no spillage has occurred
Joe Smfellippo has done a number of
inspection to verify that.

will send amended notification.

NAME Barb Cook DIVISION _____ SECTION _____



iowa department of environmental quality

reply to: Barbara Cook - Main Office
phone: 515/281-8921

mar

CERTIFIED MAIL

November 8, 1982

RECORD COPY .

File Name Can 12-7-1 HWMF
NORPLEX UOP POSTVILLE

Senders Initials BC

Mr. George J. Stunyo
Manager, Industrial Relations
Norplex Division, UOP, Incorporated
P.O. Box 1448
LaCrosse, WI 54601

RE: Norplex Division - Postville, Iowa
(EPA ID No. IAD073489288)

Dear Mr. Stunyo:

On November 1, 1982, the Department received a copy of the closure plan for the Norplex plant in Postville, Iowa. The Department has completed our review of the plan.

In order to ensure that the drum storage was "closed" properly, the Department is requesting that a certification statement be submitted identifying:

1. What was the date that all hazardous waste being accumulated was shipped off-site within 90 days from the time the waste was placed in drums? Please note that this would be the day the plant stopped accumulating waste over 90 days. If this never occurred, please identify the date the last shipment occurred.
2. What procedures were used on the above date to inspect and clean-up (if necessary) any residue caused by spillage or leakage in the drum storage area? How was the spilled waste disposed of?

This statement should be signed by the owner/operator (vice president level or above) of the company.

Your amended notification form signed September 10, 1982 listed the following wastes: U002, U031, U069, U154, U169; and U220. In an October 20, 1982 site inspection, Mr. Polk Burleson of your Postville plant identified that these wastes actually are generated in the manufacturing process and as such would not be discarded commercial chemical products or off-spec products. Therefore, the classification of these wastes should then be from the F-series not the U-series. Your notification form already included those listings F003 and F005. If this is true, I recommend that you amend your notification by deleting the U-listing wastes.

SWW309F08.01

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

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Regional Office #6
117 N. 2nd Ave.
P.O. Box 27
Washington 52353

Mr. George J. Stunyo

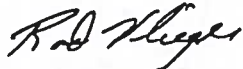
Page 2

November 8, 1982

Please submit the certification statement and the amended notification form (if required) within 15 days of the receipt of this letter. After receiving and reviewing the above, the Department will advise EPA on our decision to change the Norplex plant status to generator with short-term storage. If you have any questions on the above, please don't hesitate to call Barbara Cook of my staff at 515/281-8921.

Sincerely,

AIR & LAND QUALITY DIVISION



Rod Vlieger, P.E.
Chief, Land Operations

RV:mla/SWW309F09.01

cc: Dennis Degner, EPA Region VII
DEQ Region 1

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

Report Of Investigation

Page 1 Of 1

INVESTIGATION DATE Current 10-20-82 Last 1-13-82	FROM: IOWA DEPT. OF ENVIRONMENTAL QUALITY (Use Stamp) REGION NO. 1 209 NORTH FRANKLIN MANCHESTER, IOWA 52057 PHONE 319/927 2640
TO: (Facility Name, Location & Address) Polk Burleson, Supt. Engineering & Maintenance Norplex Division UOP Box 445 Postville, Iowa 52162	Persons Contacted (Name & Position) Polk Burleson, Supt., Engineering & Maintenance
RE: (Specify Investigation Purpose Or Cite Rule) Hazardous Waste Inspection IAD-073489288	

OBSERVATIONS/RECOMMENDATIONS

In response to a work request from DEQ Central Office, I inspected the hazardous waste areas of Norplex Division's plant in Postville, Iowa, on October 20, 1982. Five questions were supplied with the work request. I will attempt to answer them here.

The first asked whether acetone, butyl alcohol, di-n-butyl phthalate, methanol, methyl ethyl ketone and toluene are used in the manufacturing process or are they actually discarded commercial chemical products or off spec products. Polk Burleson informed me that these six are actually used in the manufacturing process.

The second question asked approximately how long it took Norplex to generate 2200 lbs. of hazardous waste. The best estimate was approximately 4 to 5 days under normal operating conditions.

The third question dealt with the length of storage time of drums in the hazardous waste storage area and the date of the last shipment. The last shipment was on October 14, 1982, and there were no drums in the hazardous waste storage area at the time of this inspection.

Question four asked whether or not the waste would be shipped off-site in 90 days or less and for documentation of this. There is no written contract stating that the waste will be shipped off-site in 90 days or less; however, from assurances by Polk Burleson, I am satisfied that the waste will be shipped off-site in 90 days or less.

The fifth question asked for inspection of the drum storage area to insure compliance with all requirements for a generator with short-term storage status. The storage area was constructed to be in compliance with regulations for a storage facility, and it was found to still be able to meet these requirements. No drums were in the storage area so proper drum labeling could not be checked at this time.

CONCLUSION:

No violations of the RCRA regulations were noted during this inspection.

JPS:mc

SUSPENSE DATE <u>11</u>	Signature <table style="width: 100%;"> <tr> <td style="width: 50%;"> Inspector Joe P. Sanfilippo </td> <td style="width: 50%;"> <i>Joe P. Sanfilippo</i> </td> </tr> <tr> <td> Regional Administrator Ron Stellick </td> <td> <i>Ron Stellick</i> </td> </tr> </table>	Inspector Joe P. Sanfilippo	<i>Joe P. Sanfilippo</i>	Regional Administrator Ron Stellick	<i>Ron Stellick</i>	Date <table style="width: 100%;"> <tr> <td>10/22/82</td> </tr> <tr> <td>10-25-82</td> </tr> </table>	10/22/82	10-25-82
Inspector Joe P. Sanfilippo	<i>Joe P. Sanfilippo</i>							
Regional Administrator Ron Stellick	<i>Ron Stellick</i>							
10/22/82								
10-25-82								
Enclosures (Specify)								
Distribution: Regional Office: Central Office: Inspected Facility								

RP-5 (8-79)

Date Copy Mailed: 10-25-82
cc: EPA - 324 E. 11th - Kansas City, MO

IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY
WORK REQUEST

Request to: <u>1</u> Region or Section	Location of Task or Facility NORPLEX DIVISION POSTVILLE	Requested by: <u>BILL COOK</u>
Routing: <u>BARB COOK</u>		Approval: _____ Compliance Division
<u>ROD VIEGER</u>		Request Logged: _____ (Date)
		Completion Logged: _____ (Date)
Needed by: <u>OCTOBER 22, 1982</u>		

Description of Task and Reason for Request (attach pertinent documents and route to Compliance Division)
ON MARCH 4, 1982 EPA REQUESTED NORPLEX'S PART B H.W. PERMIT APPLICATION. AS A RESULT OF THIS
NORPLEX INDICATED IN AN 8/24/82 LETTER THAT THEY BELIEVE THEY ARE NOW A GENERATOR WITH
SHORT TERM STORAGE. PLEASE PERFORM A SITE INSPECTION. YOUR REPORT SHOULD COVER THE
AREAS ON THE ATTACHED SHEET. IF YOU HAVE ANY QUESTIONS CONCERNING THIS INSPECTION
PLEASE CALL.

Comments

Completed by: _____ Date: _____ Supervisor: _____
Initials

ATTACH PERTINENT DOCUMENTS AND ROUTE TO COMPLIANCE DIVISION AFTER COMPLETION

RP-12 (12/80)

Norplex Division Inspection

1. Their existing Part A identifies a number of U-series waste streams (acetone, butyl alcohol, Di-n-butyl phthalate, methanol, methyl ethyl ketone, and toluene). Are these wastes actually "discarded commercial chemical products or off-spec products" or are these materials used in the actual manufacturing process? If discarded commercial chemicals products, how are they generated?
2. Approximately how long does it take Norplex to generate 2200 pounds of hazardous waste?
3. Are there any drums in the storage area which have been there for over 90 days? When was the last shipment?
4. Is the hazardous waste going to be shipped off-site in 90 days or less? If yes, please attempt to obtain a copy of a document which will ensure that this will occur (e.g. a contract with the transporter).
5. Inspect the drum storage area in accordance with the generator with short term storage. Are they in compliance with all requirements? If not, explain why not..

Norplex has submitted information (see attached) stating that the storage tank holding phenolic resins is not included in the hazardous waste management system. Do not include the storage tank in your inspection.



iowa department of environmental quality

reply to: Barbara Cook - Main Office
phone 515/281-8921

December 3, 1982

Mr. Lyndell Harrington
Chief, Permits Section, Waste Mgmt. Branch
Air & Waste Management Division
U.S. EPA, Region VII
324 East 11th St.
Kansas City, MO 64106

RE: Norplex Division, VOP, Inc. - Postville
EPA ID No. IAD073489288

Dear Lyn:

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This Department recommends that EPA rescind their March 4, 1982, Part B call and that Norplex's interim status be terminated. If you disagree with our recommendation please contact me as soon as possible.

Sincerely,

AIR AND LAND QUALITY DIVISION

Bruce E. Henning
Rod Vlieger, P.E.
Chief, Land Operations

RV:BC:nsv

EPA-ARLM/HAZM
JAN 11 1983
DES MOINES, MO

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319

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